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**ATTORNEY FOR PLAINTIFF**

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**M.L.** a pseudonym,

CASE NO.: 3:21-CV-00526-YY

Plaintiff,

**PLAINTIFF'S ANSWER TO  
COUNTERCLAIM**

v.

**JURY DEMAND**

**CASTRO & CANTU, LLC**, a domestic  
limited liability company, dba Mojave  
Grill & Cantina, **JOHN CANTU**, an  
individual, **BEATRIZ CANTU**, an  
individual, **INTERMOUNTAIN  
CLAIMS, INC.**, a foreign corporation,  
and **JOE LEE**, an individual,

Defendants.

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Plaintiff hereby answers Defendant Castro & Cantu, LLC, John Cantu, and Beatriz Cantu's (herein referred to collectively as "Mojave") counterclaim:

1. Mojave fails to allege facts that allow Mojave an independent claim for attorney fees.
2. Plaintiff denies Mojave's allegations in paragraph 104.
3. Nothing in Mojave's Counterclaims provide for an independent cause of action, and  
Mojave alleges no facts to sustain a claim or independent cause of action.
4. Mojave's counterclaims are untimely to the extent any such claim is viable.
5. Mojave fails to state a claim.

6. Mojave's counter claim is frivolous, having no legal basis in procedure or law, which entitled Plaintiff to attorney fees and costs pursuant to Oregon and Federal Law.
7. Plaintiff reserves her right to add supplemental claims for unlawful retaliation, including the addition of new parties who participated in the unlawful retaliation against Plaintiff for alleging a frivolous counterclaim in response to her lawsuit.
8. Plaintiff reserves the right to amend or allege any Affirmative Defense in response to Mojave's frivolous counter claim, which is not a counter claim.
9. PLAINTIFF DEMANDS A JURY TRIAL.

Dated this: May 27, 2021

s/Quinn E. Kuranz  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **ANSWER** on the following:

FRED CANN, Attorney for Mojave Defendants

AARON BASS, Attorney for Intermountain Claims, Inc., and Joe Lee

by USING THE ECF SYSTEM and emailing a true and correct copy thereof, addressed as above shown on the date stated below.

DATED this MAY 27, 2021

s/Quinn E. Kuranz  
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